

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TYRONE ISOM JR., ELITE )  
CLIENTLE INC. and ISOM AND )  
SOLE INC., )  
Plaintiff, ) Case No. 24 - cv - 03236  
v. )  
MAYOR TIFFANY HENYARD )  
individually and as Mayor of the Village )  
of Dolton, INSPECTOR KIM ALSTON, )  
KEITH FREEMAN, CARMEN )  
CARLISLE and VILLAGE OF )  
DOLTON, an ILLINOIS MUNICIPAL )  
CORPORATION, )

**Defendants.**

**JOINT STATUS REPORT**

NOW COMES the PLAINTIFFS, TYRONE ISOM JR., ELITE CLIENTLE INC., and ISOM AND SOLE INC., and DEFENDANTS, MAYOR TIFFANY HENYARD, INSPECTOR KIM ALSTON, CARMEN CARLISLE and VILLAGE OF DOLTON, and for their Joint Status Report on Discovery as required by this Court's August 26, 2025, minute entry [Dkt. 45], and state as follows:

1. On September 22, 2025, the Court granted the motion to dismiss brought by Defendants Alston, Freeman, and Carlisle; those claims were dismissed without prejudice. Plaintiffs and the Village of Dolton and Mayor Henyard remain.
2. Plaintiff intends to amend to cure the deficiencies identified in the Court's order and respectfully requests 21 days from the date of the Court's acceptance of this Report to file an amended complaint. If the Court prefers, Plaintiff will file a separate motion for leave

to amend. See dismissal order (without prejudice).

3. Written Discovery: Plaintiff and the Village have exchanged written discovery. The Village has produced in excess of 3,000 documents, which Plaintiffs continue to review.  
(As previously reported.)
4. Individual Defendants: Written discovery directed to the individual defendants was served; responses were deferred during the pendency of the motion to dismiss and the claims against those three defendants have since been dismissed without prejudice.
5. Current schedule: Fact discovery closes November 20, 2025.
6. In light of the intended amendment and the need to conduct depositions keyed to the operative pleadings, Plaintiff respectfully requests a 60-day extension of the fact discovery deadline (to January 20, 2026). If the Court prefers, Plaintiff will file a separate motion.

Respectfully Submitted,

/s/Kenneth Y. Hurst  
Kenneth Y Hurst

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/s/Michael J. McGrath  
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/s/Michael J. Schalka

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**CERTIFICATE OF SERVICE**

The undersigned non-attorney hereby certifies that the above **Joint Status Report** was filed on October 21, 2025 with the Northern District of Illinois ECF System, serving a copy on all parties.

*/s/ Sofia Gisiner*

Sofia Gisiner